

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JAMIE AKERS,

Plaintiff,

v.

ASTRAZENECA PHARMACEUTICALS,  
L.P.,

Defendant.

Case No. CIV-23-1067-JD

**JOINT STATUS REPORT AND MOTION TO CONTINUE STAY OF  
PROCEEDINGS PENDING MEDIATION**

Plaintiff Jamie Akers (“Plaintiff”) and Defendant AstraZeneca Pharmaceuticals LP hereby jointly submit this status report and motion to the Court to continue the stay of all proceedings and deadlines pending mediation (“Joint Motion”). In support of this Joint Motion, the Parties state as follows:

1. On October 31, 2024, the Court entered a Scheduling Order setting forth the deadlines for this case. In that Order, the Court set forth a discovery deadline of August 6, 2025; and the case is set for the Court’s December 2, 2025, trial docket. *See* Dkt. 30.
2. On June 3, 2025, the Court entered an Order, granting the Parties’ Joint Motion to Stay this Case through and until August 4, 2025. Dkt 40.
3. Pursuant to the Court’s order, the Parties were instructed to file a joint status letter by August 4, 2025, advising the Court as to status. *Id.*

4. The Parties have explored the possibility of settlement through informal settlement negotiations.

5. The parties will mediate this case before JAMS mediator Hon. Donald G. Wilkerson (Ret.) on September 4, 2025.

6. In light of their progress toward resolution, the Parties respectfully request the Court continue its stay of all proceedings and deadlines in this matter, including a stay of discovery, through and until **September 11, 2025**, to complete mediation.

7. Within seven days of mediation, and no later than the expiration of the stay period, the Parties request to submit a joint status report to the Court stating whether the matter has settled.

8. The Parties' proposed stay will conserve the Parties' resources and serve judicial economy while they work towards a potential resolution of this matter. *See* Fed. R. Civ. P. 1 (rules "should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding").

9. This is the Parties' second request to stay in this case.

**WHEREFORE**, the Parties respectfully request the Court grant this Joint Motion, and continue to stay all proceedings and deadlines through and until September 11, 2025, including a stay of discovery, to allow the Parties to schedule and complete mediation.

Dated: August 4, 2025

/s/ Robert C. Newark III

*\*signed by Defendant's counsel  
with Plaintiff's counsel's  
permission*

Robert C. Newark III, OBA #21992  
THE NEWARK FIRM  
2575 Kelley Pointe Parkway, Suite 100  
Edmond, OK 73013  
(866) 230-7236  
robert@newarkfirm.com

Jonathon C. Burns, *pro hac vice*  
BURNS LAW FIRM  
PO Box 191250  
St. Louis, MO 63119  
(314) 329-5040  
john@burns-law-firm.com

*Attorneys for Plaintiff Jamie Akers*

/s/ Nicholas V. Merkley

Nicholas ("Nick") V. Merkley, OBA #20284  
GABLEGOTWALS  
BOK Park Plaza  
499 W. Sheridan Ave., Suite 2200  
Oklahoma City, OK 73102  
(405) 235-5500  
nmerkley@gablelaw.com

Sarah E. Bouchard, *pro hac vice*  
MORGAN, LEWIS & BOCKIUS LLP  
2222 Market Street  
Philadelphia, PA 19103  
(215) 963-5000  
sarah.bouchard@morganlewis.com

Carolyn M. Corcoran, *pro hac vice*  
MORGAN, LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, NY 10178-0060  
(212) 309-6000  
carolyn.corcoran@morganlewis.com

*Attorneys for Defendant AstraZeneca  
Pharmaceuticals LP*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification to all counsel of record.

/s/Nicholas V. Merkley  
Nicholas ("Nick") V. Merkley